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FILED
U.S. DISTRICT COURT

BY: DEPUTY CLERK

SEALED

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, : Case No. 18-CR-365-JP

Plaintiff, :

v. :

JACOB ORTELL KINGSTON, : GOVERNMENT'S MOTION FOR
ISAIAH ELDEN KINGSTON, and : DETENTION FOR JACOB ORTELL
LEV ASLAN DERMEN, : KINGSTON AND ISAIAH ELDEN
a/k/a Levon Termendzhyan, : KINGSTON

Defendants. :

District Judge Jill Parish
Magistrate Judge Brooke Wells

Based on evidence developed during the course of the investigation, the United States submits that Defendants Jacob Kingston¹ and Isaiah Kingston present a flight risk, will attempt to obstruct justice, and pose a danger to the community. The United States therefore moves the

¹ The United States submits that Defendant Lev Aslan Dermen a.k.a. Levon Termendzhyan also poses a flight risk and a danger to the community and seeks his pre-trial detention. Defendant Dermen has been arrested in Los Angeles, California and it is the understanding of the United States that he will appear in the Central District of California prior to appearing in the District of Utah.

Court to detain Defendants Jacob Kingston and Isaiah Kingston pending trial as outlined herein.

I. LEGAL STANDARD AND BURDEN OF PROOF

When a case involves a serious risk that a defendant will flee or attempt to obstruct justice, the Bail Reform Act of 1984 provides that “a judicial officer shall hold a hearing to determine whether any condition of or combination of conditions … will reasonably assure the appearance of the person as required and the safety of any other person and the community.” 18 U.S.C. § 3142(f)(2). If after a hearing, the Court “finds that no conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community, such judicial officer shall order the detention of the person before trial.” 18 U.S.C. § 3142(e)(1). In determining whether there are no conditions that will reasonably assure the defendant’s appearance, the judicial officer shall “take into account the available information concerning— (1) the nature and circumstance of the offense charged...; (2) the weight of the evidence against the person; (3) the history and characteristics of the person...; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the person’s release....” 18 U.S.C. § 3142(g).

The United States must prove a serious risk of flight by a “preponderance of the evidence.” *United States v. Cisneros*, 328 F.3d 610, 613 (10th Cir. 2003) (sustaining the district court’s determination that “the government had proved by a preponderance of the evidence that Cisneros posed a serious risk of flight such that no conditions of release would reasonably assure Cisnero’s presence at trial.”). The United States must prove danger to the community by “clear and convincing evidence.” 18 U.S.C. § 3142(f).

“The rules concerning admissibility of evidence in criminal trials do not apply to the presentation and consideration of information at the detention hearing.” 18 U.S.C. § 3142(f).

Consequently, the government may proceed by proffer. *United States v. Smith*, 79 F.3d 1208, 1210 (D.C. Cir. 1996) (“Every circuit to have considered the matter … [has] permitted the Government to proceed by way of proffer.”) (citing *United States v. Gaviria*, 828 F.2d 667, 669 (11th Cir. 1987); *United States v. Martir*, 782 F.2d 1141, 1145 (2d Cir. 1986); *United States v. Winsor*, 785 F.2d 755, 756 (9th Cir. 1986); *United States v. Acevedo-Ramos*, 755 F.2d 203, 206-07 (1st Cir. 1985)). The rationale for permitting detention hearings to proceed by way of proffer is that such hearings are “neither a discovery device for the defense nor a trial on the merits.” *Smith*, 79 F.3d at 1210. “The process that is due is only that which is required by and proportionate to the purpose of the proceeding.” *Id.* “That purpose includes neither a reprise of all the evidence presented before the grand jury, *United States v. Suppa*, 799 F.2d 115, 119 (3d Cir. 1986), nor the right to confront non-testifying government witnesses, *United States v. Accetturo*, 783 F.2d 382, 388-89 (3d Cir. 1986).” *Smith*, 79 F.3d at 1210 (also citing *United States v. Hurtado*, 779 F.2d 1467, 1479 (11th Cir. 1985) (purpose of pretrial detention hearing is not to “rehash . . . probable cause” but to provide opportunity for detainee to show no risk of flight or danger to community); *United States v. Williams*, 798 F. Supp. 34, 36 (D.D.C. 1992)). “A right to require the government to produce its witnesses against [a defendant] would complicate the hearing to a degree out of proportion to the liberty interest at stake - viz. the interest in remaining free until trial, for what is by statute a period of limited duration.” *Smith*, 79 F.3d at 1210; *see also* Speedy Trial Act, 18 U.S.C. § 3161, et seq.

II. FACTUAL BACKGROUND AND VIOLATIONS

a. Violations

On August 1, 2018, a grand jury returned an indictment charging Defendant Jacob Kingston with nine counts of aiding and abetting the filing of a false tax return in violation of 26

U.S.C. § 7206(2), five counts of concealment money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i), and one count of expenditure money laundering in violation of 18 U.S.C. § 1957, and charging Defendant Isaiah Kingston with one count of concealment money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i), and one count of expenditure money laundering in violation of 18 U.S.C. § 1957. If convicted of the charges in this Indictment, Defendant Jacob Kingston faces a maximum penalty of 87 years in prison. If convicted of the charges in this Indictment, Defendant Isaiah Kingston faces a maximum penalty of 20 years in prison.

Defendants Jacob Kingston and Isaiah Kingston are the CEO and CFO and are each 50% owners of Washakie Renewable Energy (WRE) and United Fuel Supply (UFS). Defendants Jacob Kingston and Isaiah Kingston schemed with each other and with others, including Defendant Lev Aslan Dermen, to defraud the United States by obtaining \$511 million in refundable fuel tax credits, to which WRE was not entitled, as alleged in paragraphs 14 through 17 of the Indictment. As part of this wide-ranging scheme, involving individuals and companies across the country and outside of the country, the defendants created false paperwork and accounting records. They also rotated fuel and other products by truck, train, and barge, throughout the country and elsewhere, including Panama, to create the false appearance that WRE was entitled to the refundable fuel tax credits it claimed. Through their companies WRE and UFS, Defendants Jacob and Isaiah Kingston filed false IRS Forms 8849, Claim for Refund of Excise Tax, claiming refunds of over \$1.1 billion in renewable fuel tax credits. See Exhibit A (Summary of false Forms 8849). As a result of these false claims, the U.S. Treasury paid WRE over \$511 million. Defendants Jacob Kingston, Isaiah Kingston, and Lev Aslan Dermen then laundered the proceeds of their scheme, as charged in Counts Ten through Fifteen of the

Indictment.

b. Potential Sentence

The United States computes Defendant Jacob Kingston's advisory Guidelines sentence for the conduct charged in the Indictment to be life in prison. This Guidelines range reflects the size of the loss caused by the defendants, an intended loss of over \$1.1 billion and an actual loss of more than \$511 million, and the sophisticated nature of the scheme, as well as the defendant's efforts to destroy evidence and otherwise obstruct the execution of a lawful search warrant and to intimidate witnesses.

Defendant Isaiah Kingston's advisory Guidelines sentence may also be life in prison. The United States intends to offer evidence at sentencing that Defendant Isaiah Kingston was engaged in excess of \$3 billion in money laundering transactions involving the proceeds of the \$511 mail fraud scheme as well as efforts to destroy evidence and threaten witnesses. However, Defendant Isaiah Kingston's statutory maximum for the charged counts is 20 years.

c. The Order

Defendants Jacob and Isaiah Kingston are members of the Davis County Cooperative Society, also known as "The Order" and "The Kingston Order." According to witnesses, the Order is comprised of at least 7,000 members. Order members reside in various cities in Utah and surrounding states. Order members live interspersed in the communities and are not confined to a distinct, geographical location. The Order owns hundreds of businesses in Utah and the surrounding states. Order members are bound together through ties of family, religion, and the practice of communal living. The investigation has revealed that the Order owns a significant number of homes and businesses. One witness told the investigation that the Order directed an Order family to go into hiding, first hiding the family in Colorado and then in Park City, Utah,

when there was a Child Protective Services warrant out for a family member's arrest.

d. Destruction of Evidence

On February 10, 2016, the United States executed simultaneous search warrants on three office locations of WRE and UFS, Jacob Kingston's residence, a back-up server for WRE, and four locations related to the Order. During the execution of the search warrants, it became apparent that records had been removed and destroyed in anticipation of the warrants. Federal agents found computers that had been wiped or recently replaced, empty desks, and empty bookcases with dust outlines where binders and other documents were recently stored. Locations that had been described by witnesses as full of records were found nearly empty. WRE and UFS employees were moved from the main office prior to the search warrants for an alleged mold issue.

The investigation has not revealed how the defendants learned that the government obtained sealed search warrants, but multiple witnesses have stated that Defendants Jacob Kingston and Lev Aslan Dermen talked of having law enforcement contacts willing to provide them with information about ongoing covert investigations. One witness met with Defendant Jacob Kingston several weeks prior to the search warrant and Defendant Jacob Kingston stated to that witness that a federal agent tipped him off to the pending search warrants.

e. Ties to Turkey

During the course of the mail fraud scheme, Defendants Jacob Kingston and Isaiah Kingston, through WRE, wired over \$130 million of the scheme proceeds to Turkey and used these proceeds to make significant business investments. See Exhibit B (Summary of WRE wires to Turkey). On September 9, 2016, the Turkish Investment Support and Promotion Agency, which is an agency of the Turkish government, issued a press release announcing a \$950 million

investment by Washakie Renewable Energy, Noil Energy Group, and their partner and investment manager in Turkey, SBK Holding LLC (Turkey). See Exhibit C (Press Release).

Several witnesses interviewed during the course of this investigation told investigators that Defendant Jacob Kingston and Isaiah Kingston stated that they would flee to Turkey if faced with prosecution. One witness stated that Defendant Jacob Kingston said that if the government moved to arrest and prosecute him, he would flee to Turkey. This witness also heard that Defendant Jacob Kingston built a home in Turkey. Another witness told investigators that an employee of WRE heard from Defendant Jacob Kingston's brother-in-law that Defendants Jacob Kingston and Isaiah Kingston had just returned from a two-week trip to Turkey where they purchased a home and that Jacob Kingston and Isaiah Kingston intended to flee to Turkey with their families if it looked like they were going to have to go to jail. The investigation uncovered a March 5, 2014 wire from a WRE bank account to a bank account in the name of Levon Tremendzhyan at Garanti Bank in Turkey for "VAT for Waterside house, (mansion)." This wire was authorized by Defendant Isaiah Kingston.

Another witness told investigators that Defendant Jacob Kingston's Turkish business associate claimed that when Defendant Jacob Kingston travels to Turkey, he does not need to enter the country with a passport because of the money and political influence of the Turkish businessman. Further, this witness told investigators that Defendant Jacob Kingston's Turkish business partner stated that Defendant Jacob Kingston owned a house in Turkey. Another witness told investigators that Jacob Kingston traveled frequently to Turkey and upon returning from Turkey once showed the witness a video of his police escort from the airport. Multiple witnesses have stated that Defendant Jacob Kingston hired a Turkish language tutor.

Another witness, a business associate of Defendant Jacob Kingston and Defendant Lev

Aslan Dermen, stated that Defendant Jacob Kingston wired \$250 million to Turkey to purchase a Turkish bank. Rather than use his own name for the transaction, Defendant Kingston used the name of a family member of Defendant Lev Aslan Dermen. This witness was shown, by a Turkish business associate of Defendants Jacob Kingston and Lev Aslan Dermen, a bank account statement in the name of the family member showing a balance of \$160 million euros. This witness also saw a Turkish bank account statement in the name of Defendant Lev Aslan Dermen, showing a balance of \$300 million euros. This witness also stated that Defendants Jacob Kingston, Lev Aslan Dermen, and a Turkish business associate intended to buy a hotel in Turkey for \$650 million.

f. Means to Flee

In addition to having substantial financial assets and a home in Turkey, Defendants Jacob Kingston and Isaiah Kingston have access to private planes and have the means to flee the jurisdiction. Defendants Jacob and Isaiah Kingston's co-Defendant Lev Aslan Dermen leases a private plane and employs a personal pilot. Witnesses state that Defendant Jacob Kingston has repeatedly traveled with co-Defendant Dermen on his private plane. Additionally, in December 2016, SBK Holdings AS acquired BoraJet, an airline based in Turkey. *See Exhibit F (photo of SBK plane).* In August 2017, Defendant Dermen used a BoraJet plane to flee Los Angeles, California to Turkey on the same day that state search warrants were executed on his home and business locations.² Defendant Dermen returned to the United States only after all seized assets had been ordered to be returned.

g. Threats to Witnesses

Defendant Jacob Kingston and Isaiah Kingston schemed to pay an intermediary to hire an

² These search warrants were not related to the present case or underlying investigation.

enforcer to intimidate and harm at least two suspected cooperating witnesses.³

In November and December 2016, Defendant Jacob Kingston directed an intermediary by text message to send an enforcer to Miami to intimidate a potential witness and ensure that he would not cooperate with the government's investigation. *See Exhibit D* (Text messages with Jacob Kingston). Defendant Jacob Kingston and the intermediary used secret code words to refer to the enforcer ("OTEB"), the witness ("the Bird"), and Miami ("imaim"). Text messages obtained by the United States show that Defendant Isaiah Kingston delivered cash bribes to the intermediary. A selection of Exhibit D is reproduced below:

Intermediary: And our friend in FL has a meeting in front of you know who on Dec 5

J. Kingston: He needs to have his bell rung at home.

Intermediary: OTEB is leaving at 5 am to imaim

J. Kingston: Ok. Pics?

Intermediary: ??

J. Kingston: Of the bird

Intermediary: I told him

Intermediary: He is getting his own paisanos to do it

J. Kingston: Ok

J. Kingston: Any news on bird?

Intermediary: Bird is taken care of

J. Kingston: How bad?

Intermediary: Bad as in he can't make Monday's thingy thingy

³ This intermediary told investigators that he perpetrated an elaborate "cat fishing" scheme on the Defendants and explained that he received all of the cash bribes intended for "Commissioner Gordan" and other purported law enforcement officers and for the enforcer "OTEB."

J. Kingston: He can't or won't?

Intermediary: Won't period

J. Kingston: Does he know why?

Intermediary: Dude I am pretty sure they don't give details just make it very clear that if the bird sings it's very bad next time he falls will be for good

J. Kingston: That's a shame. :/

Intermediary: Yes that's why they are in cages to look good and go on cruises with all the other birds lol

h. Attempted Bribes to Witnesses

The investigation has revealed that Defendants Jacob and Isaiah Kingston paid bribes to an intermediary, who told them the bribes would be used for high-ranking officials at the Department of Justice and judges. For example, Defendant Jacob Kingston attempted to bribe an individual, whom he believed to be a high-ranking official within the Department of Justice, code name “Commissioner Gordan” to destroy records in the government’s possession. See Exhibit E. Text messages in January 2017 between Defendant Jacob Kingston and the intermediary demonstrate that Defendant Jacob Kingston was paying bribes to Commissioner Gordan, through the intermediary, in an attempt to derail and impede the government’s investigation. Further, Defendant Jacob Kingston’s text messages discuss paying the enforcer, code name “OTEB,” for the work that he had done. In the text messages, Defendant Jacob Kingston asks the intermediary repeatedly about the status of the investigation.

In Exhibit E, the intermediary states that Commissioner Gordon is working to have “this erased.” Defendant Jacob Kingston wrote, “I left 10lb of dog food w Isaiah.” Defendant Jacob Kingston and the intermediary use code-word “dog food” to refer to money used to pay bribes.

The intermediary replies, "Did you only leave that? 10lbs that's what was owed from the delivery of the birdcage plus he has to buy the dog food for the dog lover. Plus CG needs me to take care of the UT guys." In reference to payments to OTEB and others, the intermediary states "Isaiah knows what he needs to get right. I told these guys they will be taken care of[.]" See Exhibit E.

The intermediary and Defendant Jacob Kingston also discuss a grand jury appearance of a witness code-named "the dog," and Defendant Jacob Kingston solicits updates on the investigation. On November 4, 2016, Defendant Jacob Kingston texted the intermediary "Let's get Beto up his ass. See how he likes that," in reference to a witness whom he was told by the intermediary was providing information to a named IRS-CI agent assigned to this investigation.

i. Circumstances of Arrest

On August 23, 2018, Defendant Jacob Kingston was arrested at the Sale Lake City, Utah airport *en route* to Turkey by way of Amsterdam with his wife and some of his children.

III. FLIGHT RISK

Based on the foregoing, Defendants Jacob and Isaiah Kingston pose an immediate and serious risk of flight to Turkey. Defendants Jacob and Isaiah Kingston, through their jointly owned company WRE, have moved more than \$130 million in fraud proceeds to Turkey and have made hundreds of millions of dollars of investments there, including the possible purchase of a home. Multiple witnesses have stated that Defendant Jacob and Isaiah Kingston's plan was to flee to Turkey to avoid arrest and prosecution in the United States. The Defendants have access to private jets and have significant political connections in Turkey. See Exhibit G (newspaper article about Jacob Kingston's meeting with President Erdogan of Turkey). Further, the Defendants have a significant motivation to flee in light of the Defendant Jacob Kingston's

potential 87-year sentence and Defendant Isaiah Kingston's potential 20-year sentence, should they be convicted of the charges in this indictment. Defendant Jacob Kingston was arrested at the Salt Lake City airport *en route* to Turkey with his wife and some of his children.

There are no conditions or combination of conditions that will reasonably assure Defendants Jacob and Isaiah Kingston's appearance at trial short of detention. Because of the Order's vast resources and real estate holdings, there are hundreds of potential Order-related residences and businesses, both in and outside of the District of Utah, where the defendants could hide. Further, based on the Defendants and their co-conspirator's destruction of records in advance of the federal search warrants and Defendants Jacob and Isaiah Kingston's multiple attempts to intimidate and injure suspected government witnesses and bribe government officials, there is a basis to find that these Defendants will not comply with this Court's orders.

IV. DANGER TO THE COMMUNITY

Defendants Jacob and Isaiah Kingston pose an immediate danger to the community. The Defendants were alerted to the existence of search warrants on their jointly-owned business locations and Defendant Jacob Kingston's residence and the Defendants and their co-conspirators took steps to destroy and remove evidence in advance of the search warrant. In addition, the Defendants paid bribes for the purpose of destroying evidence and impeding the federal investigation and directed persons to intimidate and harm at least two possible witnesses.

"Protection of witnesses is fundamental to the proper administration of justice." *United States v. Miller*, No. 06-40151-JAR, 2008 WL 2783146, at *3 (D. Kan. July 15, 2008) (*citing United States v. Gallo*, 653 F.Supp. 320, 331-32 (E.D.N.Y.1986)). See also *United States v. Jackson*, No. CRIM. 93-10062-01, 1993 WL 405972, at *2 (D. Kan. Sept. 9, 1993) (affirming pre-trial detention where the evidence submitted at the hearing established by clear and

convincing evidence that there was a serious risk that the defendant would threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness). Recognizing this, Section 3142(f)(2)(B) gives judges the authority to deny bail where there is proof of threat to a prospective witness. *Gallo*, 653 F.Supp. at 332–31 (citing 18 U.S.C. § 3142(f)(2)(B)).

The serious risk that these Defendants will threaten, injure, or intimidate a prospective witness is a sufficient, independent basis to detain them pending trial.

V. CONCLUSION

Based on the foregoing, the United States submits that no conditions or combination of conditions will reasonably assure the appearance of Defendants Jacob and Isaiah Kingston and the safety of any other person and the community. The United States has shown by a preponderance of the evidence that Defendants Jacob and Isaiah Kingston are a serious flight risk due to their potential sentences in this case, their ties to Turkey, repeated statements regarding their intention to flee to Turkey, their access to private jets, their transfer of over \$130 million from WRE to Turkey, and the fact that Defendant Kingston was *en route* to Turkey via commercial airline at the time of his arrest. The United States has also established by clear and convincing evidence that there is a serious risk that both Defendants Isaiah and Jacob Kingston will threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness based on their previous destruction of records in advance of search warrant, and the proof of their previous attempts to pay enforcers to harm prospective witnesses.

Exhibit A – Summary of False Claims on Forms 8849

Exhibit B – Summary of WRE Wires to Turkey

Exhibit C – Press Release of WRE, NOIL, and SBK Investment in Turkey

Exhibit D – Jacob Kingston Text Messages

Exhibit E – Jacob Kingston Text Messages

Exhibit F – Photo of SBK plane

Exhibit G – Article about Jacob Kingston’s Meeting with President Erdogan (translated)

Respectfully submitted this 24th day of August, 2018.

JOHN W. HUBER
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There is a Recusal

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United States v. Kingston et al.
Summary of False Items Claimed on Forms 8849

Num.	On or About	Name of Claimant	Type of Credit Claimed on Form 8849	Gallons Reported	Rate	Refundable Credit Claimed
1.	12/21/10	WRE	Line 2a - Biodiesel mixtures	5,578,700	\$1.00	\$5,578,700
2.	02/03/11	WRE	Line 2b - Agri-biodiesel mixtures	2,584,726	1.00	2,584,726
3.	03/21/11	WRE	Line 2a - Biodiesel mixtures	1,905,114	1.00	1,905,114
4.	03/15/11	WRE	Line 3f - Liquid fuel derived from biomass	7,309,905	0.50	3,654,952
5.	04/11/11	WRE	Line 3f - Liquid fuel derived from biomass	972,000	0.50	486,000
6.	04/18/11	WRE	Line 2a - Biodiesel mixtures	1,984,000	1.00	1,984,000
7.	05/06/11	WRE	Line 2a - Biodiesel mixtures	1,145,807	1.00	1,145,807
8.	06/10/11	WRE	Line 2a - Biodiesel mixtures	1,142,891	1.00	1,142,891
9.	07/01/11	WRE	Line 3f - Liquid fuel derived from biomass	1,680,000	0.50	840,000
10.	07/19/11	WRE	Line 2a - Biodiesel mixtures	3,000,000	1.00	3,000,000
11.	07/19/11	WRE	Line 3f - Liquid fuel derived from biomass	1,000,000	0.50	500,000
12.	09/02/11	WRE	Line 2a - Biodiesel mixtures	2,500,000	1.00	2,500,000
13.	09/30/11	WRE	Line 2c - Renewable diesel mixtures	1,000,000	1.00	1,000,000
14.	10/07/11	WRE	Line 2a - Biodiesel mixtures	2,000,000	1.00	2,000,000
15.	10/12/11	WRE	Line 2c - Renewable diesel mixtures	1,000,000	1.00	1,000,000
16.	10/12/11	WRE	Line 2a - Biodiesel mixtures	3,250,000	1.00	3,250,000
17.	10/19/11	WRE	Line 2a - Biodiesel mixtures	2,000,000	1.00	2,000,000
18.	10/26/11	WRE	Line 2c - Renewable diesel mixtures	522,970	1.00	522,970
19.	11/02/11	WRE	Line 2a - Biodiesel mixtures	723,000	1.00	723,000
20.	11/09/11	WRE	Line 2c - Renewable diesel mixtures	1,495,250	1.00	1,495,250
21.	12/19/11	WRE	Line 2c - Renewable diesel mixtures	1,685,648	1.00	1,685,648
22.	12/19/11	WRE	Line 3f - Liquid fuel derived from biomass	2,200,000	0.50	1,100,000
23.	01/20/12	WRE	Line 3f - Liquid fuel derived from biomass	2,701,616	0.50	1,350,808
24.	02/13/13	WRE	Line 2a - Biodiesel mixtures	3,901,235	1.00	3,901,235
25.	02/25/13	WRE	Line 2a - Biodiesel mixtures	640,959	1.00	640,959
26.	03/08/13	WRE	Line 3f - Liquid fuel derived from biomass	40,567,319	0.50	20,283,659
27.	03/12/13	WRE	Line 2a - Biodiesel mixtures	806,041	1.00	806,041
28.	03/12/13	WRE	Line 3f - Liquid fuel derived from biomass	7,200,000	0.50	3,600,000
29.	03/26/13	WRE	Line 2a - Biodiesel mixtures	2,398,274	1.00	2,398,274
30.	03/26/13	WRE	Line 3f - Liquid fuel derived from biomass	12,922,493	0.50	6,461,246
31.	04/17/13	WRE	Line 3f - Liquid fuel derived from biomass	23,745,769	0.50	11,872,884
32.	05/20/13	WRE	Line 2a - Biodiesel mixtures	11,700,000	1.00	11,700,000
33.	06/02/13	WRE	Line 2a - Biodiesel mixtures	11,400,000	1.00	11,400,000
34.	07/29/13	WRE	Line 2b - Agri-biodiesel mixtures	25,800,000	1.00	25,800,000
35.	08/13/13	WRE	Line 2a - Biodiesel mixtures	16,200,000	1.00	16,200,000
36.	09/05/13	WRE	Line 2a - Biodiesel mixtures	35,008,437	1.00	35,008,437
37.	09/30/13	WRE	Line 2a - Biodiesel mixtures	33,465,236	1.00	33,465,236
38.	10/20/13	WRE	Line 2a - Biodiesel mixtures	33,581,899	1.00	33,581,899
39.	11/17/13	WRE	Line 2a - Biodiesel mixtures	38,078,529	1.00	38,078,529
40.	12/09/13	WRE	Line 2a - Biodiesel mixtures	33,579,440	1.00	33,579,440
41.	12/24/13	WRE	Line 2a - Biodiesel mixtures	21,789,321	1.00	21,789,321
42.	02/11/15	WRE	Line 2a - Biodiesel mixtures	170,302,364	1.00	170,302,364
43.	01/20/16	WRE	Line 2a - Biodiesel mixtures	322,900,000	1.00	322,900,000
44.	02/04/16	UFS	Line 2a - Biodiesel mixtures	321,573,260	1.00	321,573,260
Totals				1,216,942,203		\$1,166,792,650

Exhibit
A

WRE Wire Transfers to Turkey

On or About	Source of Funds	Recipient/Destination per Bank Records	Country of Destination	Amount of Wire Transfer
09/09/13	WRE	KOMAK ISI YALITIM SISTAMLERI SANAYI	Turkey	\$4,000,000
09/09/13	WRE	KOMAK ISI YALITIM SISTAMLERI SANAYI	Turkey	5,000,000
11/13/13	WRE	SBK HOLDING Turkiye Garanti Bankasi	Turkey	10,000,000
12/31/13	WRE	KOMAK ISI YALITIM SISTAMLERI SANAYI	Turkey	13,000,000
01/14/14	WRE	DOGADOGAN	Turkey	100,000
01/24/14	WRE	DOGADOGAN	Turkey	50,000
03/12/14	WRE	GARANTI BANK BNF JACOB KINGSTON	Turkey	10,000,000
03/24/14	WRE	TEKNOLOJI SISTEMLERI SAN VE TIC	Turkey	4,055,700
03/24/14	WRE	TEKNOLOJI SISTEMLERI SAN VE TIC	Turkey	5,000,000
05/09/14	WRE	TEKNOLOJI SISTEMLERI SAN VE TIC	Turkey	2,000,000
07/22/14	WRE	DOGA DOGAN BAHCELIEVLER SUBESI	Turkey	200,000
09/05/14	WRE	DOGA DOGAN BAHCELIEVLER SUBESI	Turkey	100,000
04/28/15	WRE	Turkiye Garanti Bankasi A.S.	Turkey	15,000,000
05/19/15	WRE	Wire Transfer Turkiye Garanti Ba BNF Isanne SARL	Turkey	35,000,000
05/27/15	WRE	Wire Transfer Turkiye Garanti Ba BNF Isanne SARL	Turkey	21,300,000
06/11/15	WRE	Wire Transfer to Turkiye Garanti Bankasi A.S.	Turkey	200,000
12/14/15	WRE	Turkiye Garanti Ban /BNF=Jacob Ortell Kingston	Turkey	2,100,000
12/28/15	WRE	Turkiye Garanti Ban bnf = Jacob Kingston	Turkey	6,900,000
Total				<u>\$134,005,700</u>

Exhibit

B

REPUBLIC OF TURKEY PRIME MINISTRY
INVESTMENT SUPPORT AND
PROMOTION AGENCY



YOUR ONE-STOP-SHOP
IN TURKEY

invest.gov.tr



SBK
HOLDING

Fact Sheet

September 09, 2016

\$950M Cash Flow Slated to Arrive in Total Future Investments

Noil Energy Group Inc., US-Based Washakie Renewable Energy and SBK Holding LLC are Set to Start a \$450M Equity Fund

Prime Ministry Investment Agency (ISPAT) has unveiled details of the investment due to arrive in Turkey via a deal closed by US-based Washakie Renewable Energy, Noil Energy Group, and their partner and the investment manager in Turkey, SBK Holding LLC.

Washakie Renewable Energy and Noil Energy Group operate in Utah and California, USA. Noil Energy Group (NEG) has been an active player in industry and commerce in the USA for nearly 200 years. NEG manages its highest business stakes today in the form of investments in the energy industry.

NEG operates in trading, storage and supply of all kinds of energy commodities and chemicals. It owns the largest recycling and biodiesel refinery in the Intermountain Region in the Western United States. Noil Energy's refinery is operated with nanotechnology, and is one of the leading facilities of its kind the world over. Hot on the heels of its prominent investments in energy, NEG maintains a strong presence in retail fuel distribution with a fuel distribution network that covers western US states. WRE Biofuel (<http://wrebiofuels.com>), United Fuel Supply (<http://www.ufsupply.com>)

Outside the USA, NEG has a portfolio of commercial real estate investments in Eastern Europe along with investments in chemicals and palm oil in Asia.

NEG set its eyes on Turkey back in 2001. Once their collaboration with SBK Holding Inc. was kick-started in 2013, Noil Energy eased to make their first investment. Having started out with real estate investments, NEG was soon to channel its efforts toward Mergers and acquisitions (M&A). Total investments made since 2013 in collaboration with and under the management of SBK Holding Inc. have reached \$500 million.

Total Investment to Hit the \$950M Mark

NEG has established a new \$450 million equity fund for the new investments it is poised to flow into Turkey until the end of 2016. On top of this equity fund, NEG has established a \$500 million recovery fund to leverage M&A operations in Turkey due to get well underway in 2 years.

Exhibit

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REPUBLIC OF TURKEY PRIME MINISTRY
INVESTMENT SUPPORT AND
PROMOTION AGENCY



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IN TURKEY

invest.gov.tr



The initial \$450 million equity fund is set to flow cash in the following areas as indicated below.

- \$200M in Financial Services
- \$125M in Healthcare
- \$125M in Tourism

Quick Facts About SBK Holding

Kingston Family (Jacob Kingston), based in Utah, USA; Washakie Holding LLC Conglomerate; SBK Holdings USA and Noil Holdings have made the following investments in Turkey since 2013.

Biofarma İlaç Sanayi ve Ticaret Inc.

Münir Şahin İlaç Sanayi ve Ticaret Inc.

Betasan Bant Sanayi ve Ticaret Inc.

Proles Otomotiv Ürünleri Sanayi ve Ticaret LLC

Boğaziçi Cam Sanayi Inc.

Ürosan Kimya Sanayi Inc.

Uluslararası Servis ve Lezzet Akademisi LLC

Blane Teknoloji Sistemleri Sanayi ve Ticaret Inc.

Bukombin Inc.

Bugaraj Inc.

Jeanbu Inc.

Autopia Project

- The above investments have generated direct employment opportunities for 6,500 people.
- The total amount invested is \$500M.
- As a result of these investments, continued business activities of all three business players are estimated to have given rise to a business impact in excess of 1 billion USD.
- Aside from the investments in the above companies, NEG has invested ca. \$100 million in real estate.
- The total value of investments in industry and commerce businesses and real estate investments is \$600 million.

SBK Holding operates in various areas including finance, energy, real estate, mining, industry, tourism, technology and logistics.

One of SBK Holding's main businesses is its subsidiaries in finance. SBK Holding's investment banking, asset management and raw material financing services are offered by businesses with a leading foothold in the Turkish finance industry.



SBK Holding's another

main business is its subsidiaries in the energy sector. Some of its operations in this area are outside Turkey. It has major investments in the US and Russian energy sectors. Subsidiaries operating in this sector include companies providing oil, natural gas, biodiesel, LNG production, trading and storage activities and fuel distribution services. SBK companies' business activities cover Turkey, Middle East, Russia and the Americas.

SBK Holding has wide-ranging investments and partnerships with industrial companies. On top of its businesses producing foam rubber, furniture, medicine and medical supplies, it has subsidiaries involved in the manufacturing of chemicals used in construction, cement, heat insulation materials and glass. Automotive supply and textile companies manufacturing fabric, ready wear and leather in their high capacity factories are among SBK Holding's investments.

SBK Holding's technological investments are made in strategic areas. It has companies providing technological infrastructure services to banking and security industries as well as production subsidiaries in the defense sector.

SBK Holding's mining investments are focused on copper mines in Utah, USA, and are managed by a group of companies with invaluable know-how and experience. SBK Holding' businesses will add value to the Turkish economy through new investments.

SBK investments in logistics are positioned in sea and air transportation. Its top business segment, international fuel transportation, is a major investment in this industry with a fleet of 28 oil tankers. Additionally, it has subsidiaries operating in air freight.

In real estate, SBK Holding has added value to this business area through its subsidiaries' premium projects and continues to explore new investments areas. Real estate projects have largely focused on Istanbul and Antalya.

SBK Holding has investments in hotels and holiday resorts in Turkey's South Coast. Medium-scale investment strategies include plans to grow in this sector.

WhatsApp

[1] 2016-11-13 19:51:39 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

WhatsApp

[1] 2016-11-13 19:52:38 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

Android implements the meeting in front of you know who on Dec 5.

WhatsApp

[1] 2016-11-13 19:53:11 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

Information for the self-implementing

WhatsApp

2016-11-13 19:53:25 (UTC) [1]

Sender: Jacob K UFS. (

Participants: Jacob K UFS. (

-4611)

4611), Self { (

)

Before 5th?

WhatsApp

[1] 2016-11-13 19:53:44 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

Yes

WhatsApp

[1] 2016-11-13 19:53:53 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

No

WhatsApp

[1] 2016-11-13 19:54:28 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

I will call you I have 2 hours to update the plan by Dec 5.

WhatsApp

2016-11-13 19:54:36 (UTC) [1]

Sender: Jacob K UFS. (

Participants: Jacob K UFS. (

-4611)

4611), Self { (

)

K

WhatsApp

[1] 2016-11-13 19:55:17 (UTC)
Sender: Self {
-4611), Self { }

Participants: Jacob K UFS. (

By your favor for the self-implementing

Exhibit

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WhatsApp
2016-11-19 20:05:15 (UTC) [1]
Sender: Jacob K UFS. (-4611)
Participants: Jacob K UFS. (-4611), Self ()

Let's do it

WhatsApp
2016-11-20 16:16:52 (UTC) [1]
Sender: Jacob K UFS. (-4611)
Participants: Jacob K UFS. (-4611), Self ()

Good morning.

WhatsApp
2016-11-20 16:17:08 (UTC) [1]
Sender: Jacob K UFS. (-4611)
Participants: Jacob K UFS. (-4611), Self ()

Donde usted?

WhatsApp
2016-11-20 16:18:15 (UTC) [1]
Sender: Jacob K UFS. (-611)
Participants: Jacob K UFS. (-4611), Self ()

You want me to finish JV today?

WhatsApp
2016-11-20 16:18:29 (UTC) [1]
Sender: Jacob K UFS. (-4611)
Participants: Jacob K UFS. (-4611), Self ()

What's up w soft money?

WhatsApp
[1] 2016-11-20 16:20:34 (UTC)
Sender: Self (-4611)
Participants: Jacob K UFS. ()
Self (-4611)

Just workin' on it, you'll never be aware if I know b/c my job is to be off of the files in the system.

WhatsApp
[1] 2016-11-20 16:21:06 (UTC)
Sender: Self (-4611)
Participants: Jacob K UFS. ()
Self (-4611)

View we have to go to today will have to talk with Zhenya in the morning.

WhatsApp
[1] 2016-11-20 16:22:28 (UTC)
Sender: Self (-4611)
Participants: Jacob K UFS. ()
Self (-4611)

Ok I'll see you later at the office.

WhatsApp
2016-11-20 16:22:44 (UTC) [1]
Sender: Jacob K UFS. (-4611)
Participants: Jacob K UFS. (-4611), Self ()

Ok, Pics?

Participants: Jacob K UFS. (

WhatsApp
[1] 2016-11-20 16:22:55 (UTC)
Sender: Self {
4611), Self { }

WhatsApp
2016-11-20 16:23:16 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Of the bird

Participants: Jacob K UFS. (

WhatsApp
[1] 2016-11-20 16:24:39 (UTC)
Sender: Self {
4611), Self { }

Participants: Jacob K UFS. (

WhatsApp
[1] 2016-11-20 16:24:56 (UTC)
Sender: Self {
4611), Self { }

WhatsApp
2016-11-20 16:25:07 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Ok

Participants: Jacob K UFS. (

WhatsApp
[1] 2016-11-21 00:52:14 (UTC)
Sender: Self {
4611), Self { }

WhatsApp
2016-11-21 01:12:29 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Looks good

WhatsApp
2016-11-21 01:14:24 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (, Self ()

This doesn't show profit until 2021

Participants: Jacob K UFS. (

WhatsApp
[1] 2016-11-21 01:15:11 (UTC)
Sender: Self {
4611), Self { }

WhatsApp
2016-12-02 14:28:39 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (), Self ()

Importing, etc

WhatsApp
[1] 2016-12-02 14:29:05 (UTC)
Sender: Self {
4611), Self (}
Participants: Jacob K UFS. ()

[they were talking about just photo editing in their mobile phone]

WhatsApp
2016-12-02 14:29:12 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Any news on bird?

WhatsApp
[1] 2016-12-02 14:29:35 (UTC)
Sender: Self
4611), Self
Participants: Jacob K UFS. ()

[they were talking about photo editing in their mobile phone]

WhatsApp
2016-12-02 14:55:29 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

How bad?

WhatsApp
[1] 2016-12-02 14:56:26 (UTC)
Sender: Self {
4611), Self (}
Participants: Jacob K UFS. ()

[they were talking about photo editing in their mobile phone]

WhatsApp
2016-12-02 14:56:44 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

He can't or won't?

WhatsApp
[1] 2016-12-02 14:57:21 (UTC)
Sender: Self {
4611), Self (}
Participants: Jacob K UFS. ()

[they were talking about photo editing in their mobile phone]

WhatsApp
2016-12-02 14:57:42 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Does he know why?

WhatsApp
[1] 2016-12-02 14:59:15 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

They don't say where they could give details just now it's very clever when the law enforcement guys know them he tells will be for good.

WhatsApp
2016-12-02 14:59:46 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Hmm. That's a shame. :/

WhatsApp
[1] 2016-12-02 15:00:38 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

Yes, the FBI who have the expected look at each other's messages with the other bank teller.

WhatsApp
[1] 2016-12-02 16:20:25 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

I think I'll do it again.

WhatsApp
2016-12-02 16:21:55 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Who's that?

WhatsApp
[1] 2016-12-02 16:22:19 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

My family with their names.

WhatsApp
2016-12-02 16:22:39 (UTC) [1]
Sender: Jacob K UFS. (4611)
Participants: Jacob K UFS. (4611), Self ()

Why?

WhatsApp
[1] 2016-12-02 16:23:10 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

The bank teller didn't get a copy of the file from Cochrane.

WhatsApp
[1][113] 2016-12-02 16:46:57 (UTC)
Sender: Self {
4611), Self { } }

Participants: Jacob K UFS. (

URL:

<https://mmi284.whatsapp.net/d/ESQ7FLE0Ehs42PVt1YRGJ1hBpYQ/ArCsild90Zay3HMOxXx5nqQZp0jBoZq7Vko4T9mn604c.enc>

WhatsApp
2017-01-25 02:43:31 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

You have no idea how much I owe you. and how much I appreciate what your doing.

WhatsApp
2017-01-25 02:41:53 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Boss texted me. Let's just meet in Houston Thursday night. Or Friday

WhatsApp
2017-01-25 02:42:19 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

I want to tell you again you are doing the lords work.

WhatsApp
[1] 2017-01-25 02:54:16 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Can you make a collage to be still like we wanted with Mc gregor and the other
guys that are in the organization he is working to have this created.

WhatsApp
[1] 2017-01-25 02:54:24 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Well you good [1]

WhatsApp
2017-01-25 02:55:25 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

What erased? Just Sally or everyone?

WhatsApp
[1] 2017-01-25 02:56:25 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Well (and you're welcome)

WhatsApp
2017-01-25 02:57:08 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

You going to be working a few days? Can we meet in Texas? I'm leaving tomorrow for Brownsville. I'm planning on being in Houston Friday.

WhatsApp
2017-01-25 03:00:18 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

See if you can see any reference to rats in sallys docs

Exhibit

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WhatsApp

[1] 2017-01-25 03:08:44 (UTC)

Sender: Self (916) 396-4066

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Want to take care of your legal needs? You've come to the right place. Let us know what you need and we'll help you every step of the way.
Mexican Immigration Watch International

WhatsApp

2017-01-25 03:09:28 (UTC) [1]

Sender: Jacob K UFS. ((801) 949-4611)

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Does he offer bulk discounts?

WhatsApp

2017-01-25 03:09:43 (UTC) [1]

Sender: Jacob K UFS. ((801) 949-4611)

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

2 for 1?

WhatsApp

2017-01-25 03:09:53 (UTC) [1]

Sender: Jacob K UFS. ((801) 949-4611)

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

3 for 2?

WhatsApp

[1] 2017-01-25 03:12:58 (UTC)

Sender: Self (916) 396-4066

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Want to take care of your legal needs? You've come to the right place.

WhatsApp

2017-01-25 03:13:22 (UTC) [1]

Sender: Jacob K UFS. ((801) 949-4611)

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Yes, seriously.

WhatsApp

[1] 2017-01-25 03:13:23 (UTC)

Sender: Self (916) 396-4066

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Want to take care of your legal needs? You've come to the right place.

WhatsApp

[1] 2017-01-25 03:13:58 (UTC)

Sender: Self (916) 396-4066

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Want to take care of your legal needs? You've come to the right place.

WhatsApp

2017-01-25 03:14:02 (UTC) [1]

Sender: Jacob K UFS. ((801) 949-4611)

Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

I know. I know who been orchestrating the hatred against me and my family.

WhatsApp
2017-01-25 03:15:09 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

The website, etc.

WhatsApp
[1] 2017-01-25 03:17:29 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[REDACTED] Please take necessary steps to ensure that CCE can access the site.

WhatsApp
[1] 2017-01-25 03:21:30 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[REDACTED] WhatsApp [REDACTED]

WhatsApp
2017-01-25 03:21:55 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

7am. I can have Isaiah get some food

WhatsApp
2017-01-25 03:22:20 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Or I can come over late tonight

WhatsApp
[1] 2017-01-25 03:23:22 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[REDACTED] Please let me know if you are still interested in the site or if there is anything else we need to do. I will let you know if we have the time to meet.

WhatsApp
2017-01-25 03:23:46 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

I'll come over tonight.

WhatsApp
2017-01-25 03:23:53 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Quantos?

WhatsApp
[1] 2017-01-25 03:24:44 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[REDACTED] WhatsApp [REDACTED]

WhatsApp
2017-01-25 03:25:24 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

What did she say?

WhatsApp
[1] 2017-01-25 03:27:11 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[1] 2017-01-25 03:27:11 (UTC)

WhatsApp
2017-01-25 03:27:25 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

And how recent?

WhatsApp
[1] 2017-01-25 03:44:28 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[1] 2017-01-25 03:44:28 (UTC)

WhatsApp
2017-01-25 03:44:54 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

What she say?

WhatsApp
2017-01-25 03:44:59 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

About Sally?

WhatsApp
[1] 2017-01-25 03:50:33 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

[1] 2017-01-25 03:50:33 (UTC)

WhatsApp
2017-01-25 03:51:57 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Quantos?

WhatsApp
2017-01-25 05:49:21 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Still on for 11:00?

WhatsApp
2017-01-25 14:50:34 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

I left 10lb of dog food w Isalah

WhatsApp
2017-01-25 14:51:04 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Good morning

WhatsApp
2017-01-25 14:51:37 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

How was your night w your new boyfriend ?

WhatsApp
2017-01-25 14:51:57 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

The nigger

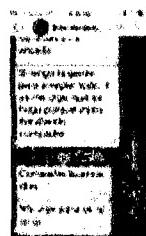
WhatsApp
[1] 2017-01-25 15:28:27 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Fuck this motherfucker he ate like Fred Bull's and can go on till 3:30 am I am so fucking tired

WhatsApp
[1] 2017-01-25 15:33:58 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Did you only leave the 7? tell me the p. whenever i owe from the delivery of the bitteree plus he has to pay the shipping on the other boxes. i have to wait for the return date of the UI quota. and then i will ask him for a refund. i didnt know cause i never went to instant mtn

WhatsApp
[1][195] 2017-01-25 15:53:01 (UTC)
Sender: Self ((916) 396-4066)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)
URL:
https://mmi734.whatsapp.net/d/UvjTeG3jA2dDgDELmciFilyd8/Apjsk3gtM4fYWYwTnh3XqDmCKVTYjORR7xShqXu_YvjR.enc



WhatsApp
[1] 2017-01-25 15:53:28 (UTC)
Sender: Self (916) 396-4066
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

As you can see Ollie he says it's night.

WhatsApp
[1] 2017-01-25 18:08:41 (UTC)
Sender: Self (916) 396-4066
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Hi

WhatsApp
2017-01-25 18:10:11 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

I can have him get more. But you need to tell me how much.

WhatsApp
[1] 2017-01-25 18:11:20 (UTC)
Sender: Self (916) 396-4066
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

http://object.hic.6GIVC6JUO6Q960W3L0M0D9Kzq;WjHDC-00fexas21M0H0C

WhatsApp
2017-01-25 18:12:20 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

WhatsApp
[1] 2017-01-25 18:12:22 (UTC)
Sender: Self (916) 396-4066
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Really like it. I know I didn't say we're invited our clients to your party (GOOK). It was accidentally???

WhatsApp
2017-01-25 18:35:37 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Nooooo

WhatsApp
[1] 2017-01-25 18:39:39 (UTC)
Sender: Self (916) 396-4066
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

YEEEEE

WhatsApp
2017-01-25 18:43:00 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self (916) 396-4066

Quantos

WhatsApp
[1] 2017-01-25 21:42:06 (UTC)
Sender: Self ((916) 396-4066}
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

WhatsApp
2017-01-25 21:42:07 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

No GJ today?

WhatsApp
[1] 2017-01-25 21:42:52 (UTC)
Sender: Self ((916) 396-4066}
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

WhatsApp
[1] 2017-01-25 21:45:28 (UTC)
Sender: Self ((916) 396-4066}
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

WhatsApp
2017-01-25 21:47:32 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

What's on her? This rediculous. The gov needs to spend their money on something worth more. Than to chase these poor ladies.

WhatsApp
[1] 2017-01-25 21:50:04 (UTC)
Sender: Self ((916) 396-4066}
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

WhatsApp
[1] 2017-01-25 21:50:13 (UTC)
Sender: Self ((916) 396-4066}
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

WhatsApp
2017-01-25 21:50:29 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

Hmm. It's just dumb

WhatsApp
2017-01-25 21:50:37 (UTC) [1]
Sender: Jacob K UFS. ((801) 949-4611)
Participants: Jacob K UFS. ((801) 949-4611), Self ((916) 396-4066)

What's on her?

WhatsApp
[1] 2017-01-25 22:00:47 (UTC)
Sender: Self ()
Participants: Jacob K UFS. (), Self ()

Sorry didn't receive your message yet, very recently though. I've checked my messages, they're all up to date.

WhatsApp
2017-01-25 22:02:37 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Nice

WhatsApp
2017-01-25 22:04:09 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

How long you going to be in slc?

WhatsApp
[1] 2017-01-25 22:06:25 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()

I'll be there today. Off to get a haircut.

WhatsApp
[1] 2017-01-25 22:06:30 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()

4200

WhatsApp
[1] 2017-01-25 22:07:10 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()

We're still working on it.

Participants: Jacob K UFS. ()

WhatsApp
[1] 2017-01-25 22:07:14 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()

3300

Participants: Jacob K UFS. ()

WhatsApp
[1] 2017-01-25 22:07:16 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()

3400

WhatsApp
2017-01-25 22:07:21 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Get me a number. \$

Participants: Jacob K UFS. (

WhatsApp
[1] 2017-01-25 22:07:55 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (

WhatsApp
[1] 2017-01-25 22:18:47 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (
URL: https://mmi682.whatsapp.net/d/XehzS6YJCNhnaZLzkFm1JVijJJFY/AiJkxet7PvYv_Xf59GAo-8AG1g5ai_rjc6HFzSEmlGMO.enc

Participants: Jacob K UFS. (

WhatsApp
[1][196] 2017-01-25 22:18:59 (UTC)
Sender: Self {
}, Self {
}

URL: https://mmi276.whatsapp.net/d/SIvxYdxIULdiEDuT_ClnmFijJFY/AsObw2XN03if62vO7RsNmBRuvGKD3T_Dkye6pfJ17ehU.enc

Participants: Jacob K UFS. (
URL: https://mmi300.whatsapp.net/d/Ipz_gFRBSrpZJ8cKECtF61iJJFc/Akw7Kv_PzolnR0r3UCiXsvTLD0Ofz2vKEZbgrXT-1XS.enc



Commissioner Gordan



Today 3:12 PM

You busy??

I am in a meeting
till about 6pm
Eastern. You all
done so soon?

No we have about
6 more files.

Do you have a
number so I can
have JK take care
of your guys?

He is asking.



Commissioner Gordan

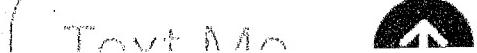


I have no clue it's
not something I
do for a living but
he needs to
consider that this
is something that
is going away and
these guys
obviously do it no
(1/2)

questions asked.
(2/2)

There are 2 or 3
guys?

2 guys left the



**Commissioner Gordan**

is going away and
these guys
obviously do it no
(1/2)

questions asked.
(2/2)

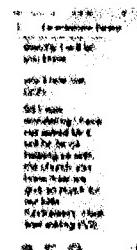
There are 2 or 3
guys?

2 guys left the
other 2 in
Houston.

Ok let me ask him
directly. I will let
you know.



WhatsApp
[1][199] 2017-01-25 22:24:34 (UTC)
Sender: Self ()
Participants: Jacob K UFS. ()
URL:
<https://mmi723.whatsapp.net/d/Fj5LU23GveUDarzZhm5GH1iJJaM/Apeqg36Q3vmTdAyzv54KUjbiJ7SQziGm4OhBc2KQi1M.enc>



WhatsApp
[1] 2017-01-25 22:24:53 (UTC)

Sender: Self ()

Participants: Jacob K UFS. ()

Yes, I'd really appreciate it to follow up!

WhatsApp
2017-01-25 22:25:09 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Nope.

WhatsApp
[1] 2017-01-25 22:25:56 (UTC)

Sender: Self ()

Participants: Jacob K UFS. ()

No/No

WhatsApp
2017-01-25 22:26:48 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

No, I can't say no

WhatsApp
[1] 2017-01-25 22:26:56 (UTC)

Sender: Self ()

Participants: Jacob K UFS. ()

No/No

WhatsApp
2017-01-25 22:27:40 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

I'll have Sally cut a check in her name.

WhatsApp
2017-01-25 22:27:44 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

**Commissioner Gordan**

~~OK let me ask him~~
directly. I will let
you know.

you know me.

(2/2)

SG I was
wondering I have
not asked Mr K
will he be ok
helping us with
the church you
know how we
give so much for
our kids
fundraisers. I feel
bad asking (1/2)

For the church

WhatsApp
[1] 2017-01-25 22:40:05 (UTC)
Sender: Self {
Participants: Jacob K UFS. (), Self { }

OK. I will do what you asked me to do.

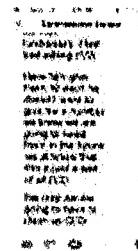
WhatsApp
2017-01-25 22:41:04 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Ok.

WhatsApp
[1][200] 2017-01-25 22:51:54 (UTC)
Sender: Self {
Participants: Jacob K UFS. (), Self { }

URL:

<https://mmi403.whatsapp.net/d/fMVfkS9Z6arC8mUQFCRP1iJLAW/Ah5m82ZcHI534EstlI30tBaw6XXNWS3S1uzhXHxQXQBb.enc>



WhatsApp
2017-01-25 22:52:44 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

How many are there?

WhatsApp
[1] 2017-01-25 22:53:04 (UTC)
Sender: Self {
Participants: Jacob K UFS. () , Self { }

I have 200 of your messages in the file.

WhatsApp
[1] 2017-01-25 23:02:22 (UTC)
Sender: Self {
Participants: Jacob K UFS. () , Self { }

I have 200 of your messages in the file.

WhatsApp
2017-01-25 23:02:44 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Ya.

**Commissioner Gordan**

~~our kids~~
fundraisers. I feel
bad asking (1/2)

Have him give
them 10 each he
doesn't want to
give me a number
we know we are
going to need
them in the future
we all know that
this is just a part
of all (1/2)

the crap we are
going to have to
clean up.(2/2)

WhatsApp

[1] 2017-01-26 04:05:53 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

We will have to travel a lot today.

WhatsApp

[1] 2017-01-26 04:08:05 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

I still know what he needs to get right. I feel these guys they will be taken care of.

WhatsApp

[1] 2017-01-26 04:08:36 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

You're going to owe him one CC'er or he got this done quicker than expected.

WhatsApp

[1] 2017-01-26 04:24:50 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

I do you the favor.

WhatsApp

[1] 2017-01-26 04:41:16 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

Will take to meeting at the earliest / soonest.

WhatsApp

2017-01-26 05:15:15 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Ya

WhatsApp

2017-01-26 05:46:37 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Need to know when I need to be in Houston.

WhatsApp

2017-01-26 05:47:13 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Are we setup for meeting for Friday?

WhatsApp

[1] 2017-01-26 15:06:37 (UTC)
Sender: Self ()
, Self ()

Participants: Jacob K UFS. ()

Regretfully will be gone together.

WhatsApp
[1] 2017-01-26 15:08:25 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (

WhatsApp
2017-01-26 15:40:11 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

I thought you said only 2

WhatsApp
2017-01-26 15:40:21 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

CG wants to talk to you

WhatsApp
2017-01-26 15:41:12 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Group Event - Started

WhatsApp
[1] 2017-01-26 15:44:13 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (

Phone 2 is not the copy line. I am worried to take care of OH. He is here already. I am meeting him at 1

WhatsApp
[1] 2017-01-26 15:44:42 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (

WhatsApp
2017-01-26 15:44:48 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

Yes

WhatsApp
[1] 2017-01-26 15:44:54 (UTC)
Sender: Self {
}, Self {
}

Participants: Jacob K UFS. (

[Not part of the original file]

WhatsApp
2017-01-26 15:45:04 (UTC) [1]
Sender: Jacob K UFS. ()
Participants: Jacob K UFS. (), Self ()

He has both

PHOTOS

Exhibit
F

ISTANBUL (IHA) 14.11.2017 - 12:33, Last Updated:14.11.2017 - 12:35

US investment giant took off for Turkey



In September, President Erdogan met with US major investment company Washakie Renewable Energy (WRE) LLC. Chairman Jacob Ortell Kingston held a series of talks last week in Ankara and Istanbul. Kingston met with many top names in Ankara and met with DEIK President Nail Olpak this evening. During the meeting, the company has learned that talk of US plans to make new investments in Turkey.

SBK Holding investments in Turkey collaborating with WRE, are preparing to take steps to create new investment plans. Central Utah, the company's president Jacob Ortelli Kingston, with President Tayyip Erdogan during a meeting in the United States, shared the details of their investment plans for Turkey.

NEW INVESTMENT SPEAKED

Kingston, over 2 months before the meeting as an expression of their commitment to sharing their investment plans in the US, he said at the meeting came to Turkey. Kingston, who made a series of investment talks in Ankara last week, met with DEIK President Nail Olpak on the evening of November 13th . During the meeting more than an hour, we were told where discussed plans for new investments in Turkey. It was expressed that the learned opinion that the mutual solidarity messages were given passed in a sincere air. The meeting, the Chairman of DEIK Olpak and WRE as well as Kingston's SBK Holding Board Chairman Sezgin Korkmaz Baran and where which are investments in Turkey Mega Asset Management Inc. General Manager Cağlar Şendil also attended.

INVESTMENT DETERMINATIONS

SBK Holding Chairman Korkmaz, who announced that they have signed a new investment cooperation agreement with WRE before the end of 2017, noted the factories and facilities they plan to buy with Kingston.



Exhibit

G

PAYMENTS IN THE LAST DOWNTOWN

Korkmaz stated that the amount of the last purchases they have made is 185 million dollars and thus the total investment amounts are close to one billion dollars. Korkmaz said that with the latest investments, 640 people will be added to the holding company. Said detailed descriptions of the new purchases Korkmaz transfer will do in the coming days, "Investor our partner believe that Turkey and the future of this country. Doğdur conducted interviews with the President in accelerating this process. We also our work with determination to leave idle and unproductive any area of the economy Turkey we are growing."



They have also blocked investments